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January 13, 2022

**BY ELECTRONIC MAIL**

Hon. Paul A. Engelmayer  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 1305  
New York, New York 10007

**Re: *United States v. William Sadleir*, No. 20 Cr. 320 (PAE)**

Dear Judge Engelmayer:

I represent Mr. William Sadleir, and I am writing you now to apologize for my late filing of Mr. Sadleir's responses to the Government's motions *in limine*, which responses were due on January 11, 2022. I very much appreciate the Court's consideration in allowing me to file Mr. Sadleir's responses today (January 13, 2022). I would like to assure the Court that the delay was not due to any lack of respect for the Court's orders or the government's schedule. Although I understand it is not justification, the recent Covid surge has dramatically impacted my office, resulting in multiple illnesses among staff and attorneys, including two positive Covid results just among the Los Angeles based trial team working on this matter.

Respectfully,

/s/ John J. Kucera  
John J. Kucera

cc: AUSAs Jared Lenow and Elizabeth Hanft (via electronic mail)